

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

INTELLECTUAL VENTURES I LLC et al.,  <i>Plaintiffs,</i>  v.  ERIE INDEMNITY COMPANY et al.,  <i>Defendants.</i>	No. 1:14-cv-00220-MRH  The Honorable Mark R. Hornak
INTELLECTUAL VENTURES I LLC et al.,  <i>Plaintiffs,</i>  v.  OLD REPUBLIC GENERAL INSURANCE GROUP, INC. et al.,  <i>Defendants.</i>	No. 2:14-cv-01130-MRH  The Honorable Mark R. Hornak
INTELLECTUAL VENTURES I LLC et al.,  <i>Plaintiffs,</i>  v.  HIGHMARK INC. et al.,  <i>Defendants.</i>	No. 2:14-cv-01131-MRH  The Honorable Mark R. Hornak

**OLD REPUBLIC DEFENDANTS' JOINDER IN  
ERIE AND HIGHMARK DEFENDANTS' MOTION TO DISMISS  
DUE TO LACK OF SUBJECT MATTER JURISDICTION**

AND NOW, come Defendants Old Republic General Insurance Group, Inc., Old Republic Insurance Company, Old Republic Title Insurance Group, Inc., and Old Republic National Title Insurance Company (collectively, “Old Republic”), by and through their counsel, and respectfully submit this Joinder. For the reasons set forth in Erie and Highmark Defendants’ Motion to Dismiss Due to Lack of Subject Matter Jurisdiction (ECF No. 75) and Memorandum in Support of Their Motion to Dismiss Due to Lack of Subject Matter Jurisdiction (ECF No. 76), Old Republic joins that motion to dismiss for lack of subject matter jurisdiction.

WHEREFORE, Old Republic respectfully requests that this Honorable Court grant the Motion and dismiss Plaintiffs Intellectual Ventures I LLC’s and Intellectual Ventures II LLC’s infringement claims with respect to U.S. Patent No. 6,519,581 under Federal Rule of Civil Procedure 12(b)(1) for lack of subject matter jurisdiction.

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Dated: February 27, 2015

Respectfully submitted,

s/ Vernon M. Winters

Vernon M. Winters

Vernon M. Winters (pro hac vice)

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